

1
2
3
4 IN THE UNITED STATES DISTRICT COURT
5 FOR THE NORTHERN DISTRICT OF CALIFORNIA
6 OAKLAND DIVISION

7 UNITED STATES OF AMERICA,

8 Plaintiff,

9 v.

10 TERRENCE GOGGIN,

11 Defendant.

Case No.: CR 18-0415 JD

**STIPULATION AND ~~PROPOSED~~
ORDER CONTINUING HEARING**

12
13 **STIPULATION OF THE PARTIES**

14 The above-entitled matter is currently scheduled for an initial status conference before the
15 Court on January 30, 2019 at 10 a.m. The parties have jointly agreed to request a continuance
16 of this appearance for approximately 30 days until February 27, 2019, or such other date as
17 convenient to the Court. The reasons for this request are that undersigned defense counsel is
18 transferring to the San Francisco office of the Office of the Federal Public Defender and is
19 transitioning his Oakland-based cases to the other Assistant Federal Public Defenders stationed
20 in Oakland; the parties therefore agree that a continuance is in order to facilitate the transition
21 and permit new counsel to assume responsibilities for this case. Additionally, no Protective
22 Order has been entered in this case yet, and the parties believe it would be most efficient for
23 substitute counsel to negotiate the terms of the Protective Order. Finally, pending entry of the
24 Protective Order, the government is preparing to produce approximately 3,000 pages of
25 discovery which substitute defense counsel will need time to review and analyze before setting
26 future dates in this matter.

27 //

28 //

1 **IT IS SO STIPULATED.**

2 January 29, 2019
3 Dated

DAVID L. ANDERSON
United States Attorney
Northern District of California

4
5 _____
 /S

6 KATIE MEDEARIS
7 Assistant United States Attorney

8 January 29, 2019
9 Dated

STEVEN G. KALAR
Federal Public Defender
Northern District of California

10 _____
 /S

11 DAVID RIZK
12 Assistant Federal Public Defender

13 ~~PROPOSED~~ **ORDER**

14 Therefore, for good cause shown, the Court finds and the parties agree that the hearing
15 currently scheduled on ^{January 10:30} ~~December 30, 2019 at 10 a.m.~~, shall be continued until February 27,
16 2019 at ^{10:30} ~~10 a.m.~~, in San Francisco, ~~, or such other date as convenient to the Court.~~ The Court
17 further finds, based on the stipulation of the parties, that the ends of justice served by granting
18 this continuance outweigh the best interest of the public and defendant in a speedy trial, and
19 accordingly excludes time under the Speedy Trial Act from January 30, 2019 through February
20 27, 2019. The Court finds this exclusion necessary to permit for continuity of counsel and to
21 allow for the effective preparation of defense counsel. 18 U.S.C. § 3161(h)(7)(B)(iv).

22 **IT IS SO ORDERED.**

23
24 January 29, 2019
25 Dated

